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Defendants: *WHTIECRYPTION CORPORATION AND*
INTERTRUST TECHNOLOGIES, CORPORATION

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12 [ADDITIONAL COUNSEL LISTED IN SIGNATURE
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WHITECRYPTION CORPORATION,

Case No. 3:15-CV-00754-WHO

Plaintiff,

**STIPULATION AND
ORDER TO CONTINUE CASE
DEADLINES**

v.

ARXAN TECHNOLOGIES, INC.,

Date: N/A

Defendant.

Time: N/A

Courtroom: 02

ARXAN TECHNOLOGIES, INC.,

Judge: Hon. William H. Orrick
450 Golden Gate Avenue
San Francisco, CA

Counter-Claimant,

v.

WHITECRYPTION CORPORATION; and
INTERTRUST TECHNOLOGIES
CORPORATION

Counter-Defendants.

1 Plaintiff and cross-defendants whiteCryption Corporation (“whiteCryption”) and Intertrust
2 Technologies Corporation (“Intertrust”) and defendant and counterclaimant Arxan Technologies,
3 Inc. (“Arxan”) stipulate and agree as follows:

4 1. On February 18, 2015, whiteCryption initiated the above-captioned action against
5 Arxan.

6 2. Arxan answered and counterclaimed against whiteCryption and Intertrust on April
7 10, 2015.

8 3. Between May and June 2015, the parties engaged in motion practice regarding the
9 counterclaims, and on June 18, 2015, the Court granted Intertrust’s motion to dismiss with leave to
10 amend.

11 4. On June 17, 2015, the Court issued a Civil Pretrial Order setting the deadlines in
12 this action. ECF No. 35.

13 5. From June through December 2015, the parties have cooperated on a phased
14 discovery effort to facilitate settlement discussions. The parties, for example, have exchanged
15 several document productions, retained software code comparison experts, and completed code
16 comparisons in an effort to identify and narrow issues for settlement discussions. Document
17 discovery, however, is not complete, nor have the parties yet taken any depositions, in favor of the
18 targeted approach described above in the lead up to a settlement discussion.

19 6. On November 2, 2015, the Court granted the parties’ request for a settlement
20 conference with a magistrate judge and ordered that the parties appear for a conference on January
21 5, 2016.

22 7. In light of the settlement conference and likely continued settlement discussions
23 after the conference if the parties are unable to reach complete resolution on January 5, 2016, the
24 parties agree that continuing all case deadlines by approximately ninety (90) days would assist in
25 the parties settlement efforts, as well as conserve the parties’ and the Court’s resources.

26 8. Neither party has previously requested an extension or modification of any
27 deadlines in the Civil Pretrial Order.

1 Therefore, the parties stipulate and agree, subject to the court's approval, that all case
 2 deadlines be extended by approximately ninety (90) days as follows:

	Current Deadline	Proposed Deadline
Deadline to amend/add parties	December 31, 2015	March 31, 2016
Fact discovery cutoff	April 15, 2016	July 15, 2016
Expert disclosure	April 29, 2016	July 29, 2016
Expert rebuttal	May 20, 2016	August 22, 2016
Expert discovery cutoff	June 10, 2016	September 12, 2016
Dispositive Motions heard by	August 10, 2016	November 9, 2016
Pretrial Conference	October 7, 2016	January 23, 2017 (or as the Court's calendar allows)
Trial (jury)	November 14, 2016	February 27, 2017 (or as the Court's calendar allows)

14 Respectfully submitted,

15 Dated: December 18, 2015

16 By: /s/Michael T. Jones
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 21 Attorneys for Defendant/Counter-Claimant:
 ARXAN TECHNOLOGIES, INC.

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3 Respectfully submitted,
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Dated: December 18, 2015

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9 *DEFENDANTS: WHIECRYPTON CORPORATION*
AND INTERTRUST TECHNOLOGIES, CORPORATION

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11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12 Dated: December 21, 2015

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HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT JUDGE